## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO: 1:05-cr-00368-CAB-1

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Plaintiff, : JUDGE Christopher A. Boyko

V. :

:

RONALD J. GEORGE,

MOTION TO MODIFY SENTENCE

Defendant :

NOW COMES the Defendant, RONALD J. GEORGE, by and through undersigned counsel, hereby moves this Honorable Court to modify the sentence imposed in the above-captioned matter. This Honorable Court ordered restitution to be paid by the Defendant, Ronald J. George to victim, Rain Drop Products, Inc., herein after "Rain Drop", in the amount of \$332,863.50 on January 10, 2006.

Since being release from prison in 2006, Defendant has paid to Rain Drop the sum of \$1,500.00 per month towards said restitution with a balance due of approximately \$215,000.00. Due to the Defendant being 68 years of age and being forced into retirement due to the acquisition of his current employers company, the parties have agreed to a sump sum payment of \$100,000.00 to satisfy restitution pursuant to a Settlement Agreement and Release, attached hereto as Exhibit A in support of this Motion.

WHEREFORE, Defendant prays this Court modify his sentence and allow restitution to be paid in the amount of \$100,000.00 as a one time lump sum payment to settlement this requirement of his sentence in the above-captioned matter.

Respectfully submitted,

Callahan, Greven, Rilley & Sinn, L.L.C.

s/ Michael T. Callahan

Michael T. Callahan (0013533) Attorney for Defendant 137 South Main Street, Suite 300 Akron, Ohio 44308 (330) 376-9260 Fax (330) 376-9307

## **CERTIFICATE OF SERVICE**

This is to certify that the foregoing was sent on this the 24<sup>th</sup> day of October, 2016, electronically via the Court's electronic filing system to all parties indicated on the filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/ Michael T. Callahan
Michael T. Callahan (0013533)